## Case 2:23-cv-00515-MMB Document 13-20 Filed 01/30/24 Page 1 of 2

From:

Williams, Laura

To: Cc:

Figueroa, Hector; Johnson, Jamal Brown, Munsanda; "John McLaughlin" RE: (EXTERNAL) Information request

Subject:

Friday, April 8, 2022 2:20:26 PM

Date:

John,

Please see below.

## Laura K. Williams

Prison Warden George W. Hill Correctional Facility 500 Cheyney Road Glen Mills, PA 19373 Office: 610-361-3200 x 252



From: Figueroa, Hector

Sent: Friday, April 8, 2022 2:13 PM

To: Williams, Laura < WilliamsL@co.delaware.pa.us>; Johnson, Jamal < JohnsonJ@co.delaware.pa.us>

Cc: Figueroa, Hector < Figueroa H@co.delaware.pa.us >; Brown, Munsanda

<BrownM@co.delaware.pa.us>

Subject: FW: (EXTERNAL) Information request

Importance: High

All, I just received the requesting listings from Steve Richman; we should discuss.

Take Care Hector

From: Stephen C. Richman < SRichman@markowitzandrichman.com >

Sent: Friday, April 8, 2022 1:00 PM

To: Figueroa, Hector < Figueroa H@co.delaware.pa.us>

Subject: (EXTERNAL) Information request

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As was noted at the recent meeting that the Union had with the County, the Union will need some information to better represent the employees. I have listed below, the information requested. I understand that you will have to discuss with your team in order to respond properly.

- 1. List of former GEO employees hired by the County.
- 2. List of former GEO employees not hired by the County.
- 3. Criteria utilized by the County in making hiring decisions.
- 4. Did the county have access to GEO's personnel records in making these decisions and, if so, the authority of the County to access these personnel records?
- 5. List of new hires for the correctional officer positions who were not former GEO employees.
- 6. Confirmation that the County will agree to file a joint petition for certification with the Union to be filed with the Pennsylvania Labor Relations Board – and the contact person for the County for that purpose.
- Confirmation of the arrangements to be utilized by the Union to continue to service its membership until the terms and conditions of a new collective bargaining agreement are negotiated.
- 8. Contact person from the County who will negotiate the collective bargaining agreement.

We would appreciate a response to the above at your earliest convenience. The Union looks forward to working with the County to negotiate a fair and proper collective bargaining agreement to benefit the County, the bargaining unit employees and the citizens of the County.